

EXHIBIT A

1 Ruderman

2 | March of 2020?

3 | A. No.

4 MS. DONNELLY: Now is a good time to
5 break.

6 (A luncheon recess was taken from
7 the record.)

8 | AFTERNOON SESSION:

9 Q. Other than this lawsuit against the
10 Prakhin Law Firm, have you ever been a party to a
11 lawsuit before either as a plaintiff or a
12 defendant?

13 A. I've been a defendant in motor
14 vehicle accidents.

15 Q. Accidents?

16 A. Yeah.

17 O. Okay.

18 How many?

19 A. Two.

20 Q. Cases?

21 A. Sorry.

22 Q. Two.

23 And you were a defendant in both of
24 those?

25 A. Yes.

1 Ruderman

2 Q. And what was the outcome of those
3 cases?

4 A. One of them was dismissed. They
5 lost at trial and the other one is still pending.

6 Q. And I am assuming that they were
7 based on car accidents that you were involved in?

8 A. Yes.

9 0. Were you the driver of the car?

10 A. Yes.

11 O. And when did these accidents occur?

12 A. I don't recall.

13 Q. Do you recall the years?

14 A. Not of the one that went to trial.

15 The pending one, maybe 2017, 2016. Something

16 like that.

17 O. So it has been pending for a whi

18 A. Yes.

19 0. And the one that went to trial,

20 there was a verdict in your favor?

21 A. Yes.

22 Q. Other than the motor vehicle

23 accidents, any other litigation that you've been
24 involved in?

25 A. Not that I'm aware of, no.